

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

ANNIE LOIS GRANT; QUENTIN T. HOWELL; ELROY TOLBERT; TRIANA ARNOLD JAMES; EUNICE SYKES; ELBERT SOLOMON; DEXTER WIMBISH; GARRETT REYNOLDS; JACQUELINE FAYE ARBUTHNOT; JACQUELYN BUSH; and MARY NELL CONNER,

Plaintiffs,

v.

BRAD RAFFENSPERGER, in his official capacity as the Georgia Secretary of State; WILLIAM S. DUFFEY, JR., in his official capacity as chair of the State Election Board; MATTHEW MASHBURN, in his official capacity as a member of the State Election Board; SARA TINDALL GHAZAL, in her official capacity as a member of the State Election Board; EDWARD LINDSEY, in his official capacity as a member of the State Election Board; and JANICE W. JOHNSTON, in her official capacity as a member of the State Election Board,

Defendants.

CIVIL ACTION FILE
NO. 1:22-CV-00122-SCJ

**PLAINTIFFS' NOTICE OF DEPOSITION DESIGNATIONS WITH
OBJECTIONS, COUNTER-DESIGNATIONS, AND RESPONSES**

The *Grant* Plaintiffs hereby file their designations of the deposition transcripts and deposition exhibits that they may offer at trial in place of live testimony,¹ *see* [Doc. 235], along with Defendants' objections and counter-designations to the same and Plaintiffs' corresponding responses and objections, as follows:

DEPOSITION OF Annie Lois Grant

Plaintiffs' Designation Start	Plaintiffs' Designation Stop	Defendants' Objections to Plaintiffs' Designations	Defendants' Counter-Designations	Plaintiffs' Responses to Defendants' Objections	Plaintiffs' Objections to Defendants' Counter Designations
42:6	42:25	None	None	N/A	N/A

DEPOSITION OF Quentin T. Howell

Plaintiffs' Designation Start	Plaintiffs' Designation Stop	Defendants' Objections to Plaintiffs' Designations	Defendants' Counter-Designations	Plaintiffs' Responses to Defendants' Objections	Plaintiffs' Objections to Defendants' Counter Designations
60:15	62:25	The witness states a legal conclusion in 61:25–62:4 that should not be considered.	None	Plaintiffs do not object to striking 61:25–62:4.	N/A

¹ Plaintiffs reserve the right to call live any of the witnesses they have designated by deposition testimony.

DEPOSITION OF Elroy Tolbert

Plaintiffs' Designation Start	Plaintiffs' Designation Stop	Defendants' Objections to Plaintiffs' Designations	Defendants' Counter-Designations	Plaintiffs' Responses to Defendants' Objections	Plaintiffs' Objections to Defendants' Counter Designations
10:4	11:23	None	None	N/A	N/A

DEPOSITION OF Triana Arnold James

Plaintiffs' Designation Start	Plaintiffs' Designation Stop	Defendants' Objections to Plaintiffs' Designations	Defendants' Counter-Designations	Plaintiffs' Responses to Defendants' Objections	Plaintiffs' Objections to Defendants' Counter Designations
46:2	47:16	None	None	N/A	N/A

DEPOSITION OF Eunice Sykes

Plaintiffs' Designation Start	Plaintiffs' Designation Stop	Defendants' Objections to Plaintiffs' Designations	Defendants' Counter-Designations	Plaintiffs' Responses to Defendants' Objections	Plaintiffs' Objections to Defendants' Counter Designations
30:15	32:4	None	None	N/A	N/A

DEPOSITION OF Elbert Solomon

Plaintiffs' Designation Start	Plaintiffs' Designation Stop	Defendants' Objections to Plaintiffs' Designations	Defendants' Counter-Designations	Plaintiffs' Responses to Defendants' Objections	Plaintiffs' Objections to Defendants' Counter Designations
40:5	40:24	None	None	N/A	N/A

DEPOSITION OF Dexter Wimbish

Plaintiffs' Designation Start	Plaintiffs' Designation Stop	Defendants' Objections to Plaintiffs' Designations	Defendants' Counter-Designations	Plaintiffs' Responses to Defendants' Objections	Plaintiffs' Objections to Defendants' Counter Designations
48:14	49:20	None	None	N/A	N/A

DEPOSITION OF Garrett Reynolds

Plaintiffs' Designation Start	Plaintiffs' Designation Stop	Defendants' Objections to Plaintiffs' Designations	Defendants' Counter-Designations	Plaintiffs' Responses to Defendants' Objections	Plaintiffs' Objections to Defendants' Counter Designations
39:4	40:19	None	None	N/A	N/A

DEPOSITION OF Jacqueline Arbuthnot

Plaintiffs' Designation Start	Plaintiffs' Designation Stop	Defendants' Objections to Plaintiffs' Designations	Defendants' Counter-Designations	Plaintiffs' Responses to Defendants' Objections	Plaintiffs' Objections to Defendants' Counter Designations
10:20	11:25	None	None	N/A	N/A

DEPOSITION OF Jacquelyn Bush

Plaintiffs' Designation Start	Plaintiffs' Designation Stop	Defendants' Objections to Plaintiffs' Designations	Defendants' Counter-Designations	Plaintiffs' Responses to Defendants' Objections	Plaintiffs' Objections to Defendants' Counter Designations
10:3	10:16	None	None	N/A	N/A

DEPOSITION OF Mary Nell Conner

Plaintiffs' Designation Start	Plaintiffs' Designation Stop	Defendants' Objections to Plaintiffs' Designations	Defendants' Counter-Designations	Plaintiffs' Responses to Defendants' Objections	Plaintiffs' Objections to Defendants' Counter Designations
8:11	9:12	None	None	N/A	N/A

[signature block on following page]

Dated: August 4, 2023

By: **Adam M. Sparks**
Joyce Gist Lewis
Georgia Bar No. 296261
Adam M. Sparks
Georgia Bar No. 341578
KREVOLIN & HORST, LLC
One Atlantic Center
1201 West Peachtree Street, NW,
Suite 3250
Atlanta, Georgia 30309
Telephone: (404) 888-9700
Facsimile: (404) 888-9577
Email: JLewis@khlawfirm.com
Email: Sparks@khlawfirm.com

Respectfully submitted,

Abha Khanna*
Jonathan P. Hawley*
Makeba A.K. Rutahindurwa*
ELIAS LAW GROUP LLP
1700 Seventh Avenue,
Suite 2100
Seattle, Washington 98101
Phone: (206) 656-0177
Facsimile: (206) 656-0180
Email: AKhanna@elias.law
Email: JHawley@elias.law
Email: MRutahindurwa@elias.law

Michael B. Jones
Georgia Bar No. 721264
ELIAS LAW GROUP LLP
250 Massachusetts Avenue NW,
Suite 400
Washington, D.C. 20001
Phone: (202) 968-4490
Facsimile: (202) 968-4498
Email: MJones@elias.law

Counsel for Plaintiffs

*Admitted *pro hac vice*

CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing **PLAINTIFFS' NOTICE OF DEPOSITION DESIGNATIONS WITH OBJECTIONS, COUNTER-DESIGNATIONS, AND RESPONSES** has been prepared in accordance with the font type and margin requirements of LR 5.1, N.D. Ga., using font types of Times New Roman, point size of 14, and Century Schoolbook, point size of 13.

Dated: August 4, 2023

Adam M. Sparks

Adam M. Sparks

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that I have on this date caused to be electronically filed a copy of the foregoing **PLAINTIFFS' NOTICE OF DEPOSITION DESIGNATIONS WITH OBJECTIONS, COUNTER-DESIGNATIONS, AND RESPONSES** with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to counsel of record.

Dated: August 4, 2023

Adam M. Sparks

Adam M. Sparks

Counsel for Plaintiffs